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February 22, 2008

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**Re: Certification of Annual 47 C.F.R. § 64.2009(e) CPNI Filing, EB Docket 06-36  
Century Enterprises, Inc., March 1, 2008**

Dear Ms. Dortch:

Attached please find Century Enterprises' Certification of CPNI Filing and the accompanying descriptive statement of how Century Enterprises' CPNI procedures and actions ensure that Century Enterprise is in compliance as required by Section 64.2009 of the Commission's Rules. Also attached, for your records, is a copy of Century Enterprises' CPNI Policies and Procedures Manual.

The undersigned can be contacted should you have any questions or require additional information.

Sincerely,

Russell D. Schrodt  
Executive Vice President/General Manager

Attachments

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for: 2007

Date filed: February 22, 2008

Name of company covered by this certification: **Century Enterprises, Inc.**

Form 499 Filer ID: 808474

Name of signatory: **Russell D. Schrodt**

Title of signatory: **Executive Vice President/General Manager**

I, **Russell D. Schrodt**, certify that I am an officer of the company named above, and acting as agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that Century Enterprises is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Also included with this certification is a copy of Century Enterprises' CPNI Policies and Procedures Manual.

Century Enterprises has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

Century Enterprises has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: \_\_\_\_\_

Russell D. Schrodt

Attachments

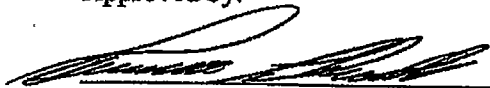
**CENTURY ENTERPRISES**

**CPNI**

**POLICIES & PROCEDURES**

**MANUAL**

Approved by:



General Manager/Date

Effective: Dec. 8, 2007

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## **I. Definitions**

This Century Enterprises ("Century") CPNI policy manual relies on the following definitions:

**A. An "Address of record,"** whether postal or electronic, is an address that Century has associated with the customer's account for at least 30 days.

1. Where there are multiple addresses of record, Century will deem only the billing address or member address as authorized unless the Customer requests in writing a different set of addresses.

**B. An "Affiliate"** is a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another to own an equity interest (or the equivalent thereof) of more than 10 percent.

**C. "Call detail" or "Call detail information"** is a form of CPNI and includes any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, date, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, date, location, or duration of any call.

**D. "Communications-related services"** means telecommunication services, information services typically provided by Century and services related to the provision or maintenance of customer premises equipment.

**E. A "Customer"** of Century is a person or entity to which Century is currently providing service.

**F. "Customer premises equipment" or "CPE"** means equipment employed on the premises of a Customer (other than a carrier) to originate, route, or terminate telecommunications.

**G. "Customer Proprietary Network Information" or "CPNI" means –**

1. information that relates to the quantity, technical configuration, type, destination, and amount of use of a Telecommunications Service subscribed to by any customer of Century, and that is made available to Century solely by virtue of the Century-customer relationship; and

2. information contained in the bill pertaining to telephone exchange service or telephone toll service received by a customer of Century; except that such term does not include subscriber list information.

**H. "FCC"** stands for the Federal Communications Commission.

**I. "Information services typically provided by Century"** refers to information services such as Internet access or voice mail services. The phrase does not include retail

consumer services provided through an Internet website (such as travel reservation services or mortgage lending services), whether or not such services may otherwise be considered information services.

**J. "Local Exchange Carrier" or "LEC"** means any person that is engaged in the provision of telephone exchange service or exchange access. The term does not include a commercial mobile service under section 332(c) of federal Telecommunications Act, except to the extent that the FCC or the Illinois Commerce Commission finds that such service should be included in the definition of such term.

**K. "Opt-in approval"** refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Opt-in approval requires that Century obtain from its customer affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of Century's request consistent with the requirements.

**L. "Opt-out approval"** refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under Opt-Out Approval, a customer is deemed to have consented to the use, disclosure, or access to its CPNI if the customer has failed to object thereto within the waiting period described after the customer is provided appropriate notification of Century's request for opt-out consent consistent with the rules.

**M. "Password"** means a word or sequence of alpha and numeric characters which is secret to the customer and which is used to limit access to a customer's account to authorized individuals.

**N. "Pretexting"** means pretending to be a particular customer or other authorized person in order to obtain access to that customer's call detail or other private communications records.

**O. "Subscriber list information" or "SLI"** means any information –

1. identifying the listed names of subscribers of Century and such subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and
2. Century or an affiliate has published, caused to be published, or accepted for publication in any directory format.

**P. "Telecommunications Service"** means the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.

**Q. "Telephone number of record"** means the telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information."

**R. "Valid Photo Identification"** means an official identification document issued by a federal or state governmental agency that identifies the holder of the document and that includes a photograph of sufficient clarity to positively identify the holder of the document.

## **II. Company Policy Regarding CPNI**

Customer Proprietary Network Information (CPNI) is information that Century obtains when providing telecommunications services to our customers, including services provided by our affiliates. Under federal law, customers have the right and Century has the duty to protect the confidentiality of information regarding the telecommunication services to which customers subscribe. This confidential information includes such things as, specific services the customer purchases, the number of services purchased, who the provider is for a service, call detail records, and charges related to services purchased. Century takes its responsibility to protect our customer's CPNI very seriously and we do not use, disclose, or allow access to our customer's CPNI except as allowed by law.

Century authorized employees are allowed to use CPNI as necessary:

1. to initiate, render, bill and collect for telecommunications services Century provides;
2. to protect the rights or property of Century, or to protect users of telecommunications services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services; or
3. to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if the customer initiated the call and the customer approves of the use of the information to provide such service.

Upon affirmative written request by the customer, Century shall also disclose CPNI to anyone designated by the customer.

Other use, disclosure, or access to CPNI for marketing purposes will be permitted only within FCC rules.

Century will follow all applicable FCC rules as contained in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations.

Specific Century procedures are as follows:

## **III. Marketing**

### **A. Customer Approval Necessary**

Subject only to opt-out approval, Century may use a customer's individually identifiable CPNI for the purpose of marketing Century's own communications-related services to that customer or may disclose its customer's individually identifiable CPNI only to Century's agents and affiliates that provide communications-related services so that such agents and affiliates may market communications-related services to that customer. Century shall implement a system by which

the status of a customer's CPNI approval can be and will be clearly established prior to the use of CPNI.

Century shall maintain a record, electronically or in some other manner, of its own and its affiliates' sales and marketing campaigns that use customers' CPNI. A record shall be maintained of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record shall include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. This record will be retained for a minimum of one year. Sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

After giving customers notice and an opportunity to opt-out, Century will wait a 30-day minimum period of time before assuming customer approval to use, disclose, or permit access to CPNI. Century will notify customers as to the applicable waiting period for a response before approval is assumed. In the case of notification by mail, the waiting period shall begin to run on the third day following the date that the notification was mailed. In the case of an electronic form of notification, the waiting period shall begin to run from the date on which the notification was sent.

## **1. Written and Electronic Notification**

Century has established an opt-out letter and form consistent with the requirements of the FCC Rules attached to this manual. If the letter and form are ever modified in the future, Century will ensure that they are consistent with the specific notice provisions of the FCC rules set forth below:

### **a) Opt-out – General Notice Requirements**

- 1) Century will provide notification to the customer of the customer's right to restrict use of, disclosure of, and access to that customer's CPNI.
- 2) The notification will provide sufficient information to enable the customer to make an informed decision as to whether to permit Century to use, disclose, or permit access to, the customer's CPNI.
- 3) The notification shall state that the customer has a right, and Century has a duty, under federal law, to protect the confidentiality of CPNI.
- 4) The notification shall specify the types of information that constitute CPNI and the specific entities that will receive the CPNI, describe the purposes for which CPNI will be used, and inform the customer of the customer's right to disapprove those uses, and deny or withdraw access to CPNI at any time.
- 5) The notification shall advise the customer of the precise steps the customer must take in order to grant or deny access to CPNI, and shall clearly state that a denial of approval will not affect the provision of any services to which the customer subscribes. Century may provide a brief statement, in clear and

neutral language, describing consequences directly resulting from the lack of access to CPNI.

- 6) The notification shall be comprehensible and shall not be misleading.
- 7) The notice shall be clearly legible, use sufficiently large type, and be placed in an area so as to be readily apparent to a customer.
- 8) If any portion of a notification is translated into another language, then all portions of the notification shall be translated into that language.
- 9) Century may state in the notification that the customer's approval to use CPNI may enhance Century's ability to offer products and services tailored to the customer's needs. Century also may state in the notification that it may be compelled to disclose CPNI to any person upon affirmative written request by the customer.
- 10) Century shall not include in the notification any statement attempting to encourage a customer to freeze third-party access to CPNI.
- 11) The notification shall state that any approval, or denial of approval for the use of CPNI outside of the service to which the customer already subscribes from that carrier is valid until the customer affirmatively revokes or limits such approval or denial.
- 12) Century's solicitation for approval shall be proximate to the notification of a customer's CPNI rights.

**b) Opt-Out – Electronic Notice Requirements**

- 1) Century shall first obtain express, verifiable, prior approval from customers to send notices via e-mail regarding services in general, or CPNI in particular;
- 2) Century shall allow customers to reply directly to e-mails containing CPNI notices in order to opt-out;
- 3) Opt-out e-mail notices that are returned as undeliverable shall be sent to the customer in another form before Century may consider the customer to have received notice.
- 4) The subject line of the message shall clearly and accurately identify the subject matter of the e-mail; and
- 5) Century shall make available to every customer a method to opt-out that is of no additional cost to the customer and that is available 24 hours a day, seven days a week. Century may satisfy this requirement through a combination of methods, so long as all customers have the ability to opt-out at not cost and are able to effectuate that choice whenever they choose.

## **2. Oral Notice - One-Time Use of CPNI**

Century may use oral notice to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call. The contents of any such notification must comply with the general opt-out requirements listed above, except that Century may omit any of the following notice provisions if not relevant to the limited use for which the carrier seeks CPNI:

- a) Century need not advise customers that if they have opted-out previously, no action is needed to maintain the opt-out election;
- b) Century need not advise customers that it may share CPNI with its affiliates or third parties and need not name those entities, if the limited CPNI usage will not result in use by, or disclosure to, an affiliate or third party;
- c) Century need not disclose the means by which a customer can deny or withdraw future access to CPNI, so long as carriers explain to customers that the scope of the approval the carrier seeks is limited to one-time use; and
- d) Century may omit disclosure of the precise steps a customer must take in order to grant or deny access to CPNI, as long as Century clearly communicates that the customer can deny access to CPNI for the call.

## **3. Opt-Out Failures**

Century shall provide written notice within 5 business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. The notice shall be in the form of a letter, and shall include Century's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information. Such notice must be submitted even if the carrier offers other methods by which consumers may opt-out.

## **B. Customer Approval Not Necessary**

Century may use, disclose, or permit access to customer CPNI by Century's affiliate(s) who provide telecommunications services for marketing purposes as long as the customer obtains a category of service from both Century and its telecommunication affiliate(s) at the same time.

Century as the provider of long distance to the customer is allowed to use, disclose, or permit access to our customers CPNI for marketing other long distance services to customers based on the customers' long distance CPNI.

Century may use CPNI of a customer lost to a competitor in an attempt to "Win Back" the customer.

## **IV. Release of Call Detail Information**

### **A. Password Protection**

Due to the sensitive nature of call detail CPNI information, the FCC maintains rules pertaining to the use and disclosure of call detail information.

Century will allow our customers to establish a password and will require a customer to provide that password during a customer-initiated telephone call before Century will disclose or discuss call detail information. For customer protection, this password cannot derive from readily available biographical or account information such as the customer's social security number, mother's maiden name, home address or date of birth.

In conjunction with issuing a password, Century may ask the customer to provide a secret question and answer. In the case of a lost or forgotten password, Century may ask the secret question which should prompt the customer for the appropriate answer. Century may then provide the password to the customer. Again, the secret question and answer cannot derive from biographical or account information. As an example the customer's secret question might be; what is the color of my eyes? or, what is my dog's name? In which case, the back-up answers may be "green" or "Gizmo," respectively.

### **B. Authorized Release**

Century will release call detail information to the customer of record or a designated person of record only if certain specific requirements have been met:

#### **1. Customer-Initiated Telephone Account Access**

Release of any call detail information requested by the customer via a customer-initiated telephone call is prohibited except when:

- a) the requesting individual provides a password of record or proper backup answer to a secret question; or
- b) the information will be sent to the customer's address of record; or
- c) Century will call the telephone number of record and disclose the call detail information; or

If a customer is able to provide call detail specifics such as called number, time and duration of the call, and, if applicable, the amount charged for the call, then Century may discuss that specific call detail information with the customer without regards to items (a), (b) and (c) above. In this case, Century will not discuss or disclose information regarding call detail for any call other than the call(s) the customer identified during that particular contact.

#### **2. Retail Location Account Access**

Customers must have a valid photo identification to obtain call detail CPNI information at a Century retail location.

### **3. Online Account Access**

Century requires an online password to protect online access to CPNI. Passwords will be designed by the customer and will consist of alpha and numeric characters.

Century will authenticate both new and existing customers seeking online access to their CPNI.

Century can reinitialize existing passwords for online access but will NOT base online access on readily available biographical or account information. This procedure will relate to all CPNI, not just call detail.

Online access to CPNI will be blocked after 5 unsuccessful attempts to log on. Once a customers' online account has been blocked as a result of unsuccessful attempts, the customer must contact the Century business office to re-establish customer's online account.

### **C. Business Customer Exemption**

Business customers may by contract obtain a variance or exemption from these CPNI policies if they are served only by a dedicated Century representative as the primary contact and have a contract in place that includes language regarding Century's duty to protect their CPNI.

## **V. Notification of Account Changes**

Century will notify customer immediately of any account changes including, whenever a password, back-up question, online account, or address of record is created or changed. Century will also notify the Customer whenever a back-up question is used, regardless of whether it is changed. Century will attempt to reach the customer by voicemail or by correspondence sent to the address of record as it was prior to the change. Such notification will not disclose the changed account information. New customers are exempt from this notification at service initiation.

## **VI. Procedures to Protect Against Pretexting**

Century has employed the above procedures and safeguards in order to achieve reasonable measures designed to discover and protect against pretexting.

## **VII. Annual Certification**

Century will certify annually compliance to the CPNI rules. This certification will be filed with the FCC and will be made publicly available by request. Certification is due on or before March 1 for data pertaining to the previous calendar year.

Century's annual certification will be signed by an officer as an agent of Century, stating that he/she has personal knowledge that Century has established operating procedures that are adequate to comply with the FCC CPNI rules. Century may submit a copy of its CPNI Policies & Procedures Manual to the FCC along with the annual certification.

In addition to the annual certification, Century will provide an accompanying statement explaining how Century's procedures ensure that Century is or is not in compliance with the FCC's CPNI rules. In the explanation, Century will include:

- A. the training employees receive to protect CPNI;
- B. the disciplinary process applicable to improper disclosure of CPNI;
- C. the process used to ensure all requests to opt-in or opt-out are recorded and follow-up methods used;
- D. an explanation of any actions taken against data brokers (information with respect to the processes pretexters are using in an attempt to access CPNI);
- E. Information the company possesses with respect to the processes pretexters are using in an attempt to access CPNI;
- F. a summary of all customer complaints received in the past year concerning unauthorized release of CPNI;
- G. the process used to ensure that Opt-Out elections are recorded and followed; and
- H. other measures relevant to demonstrate compliance with the FCC's CPNI rules.

## **VIII. Notice of Unauthorized Disclosure of CPNI**

Responsibility to notify USSS and FBI has been assigned to the General Manager.

**A. Notification of law enforcement agencies.** FCC rules require Century to notify law enforcement of any CPNI breaches no later than 7 business days after a reasonable determination that a breach has occurred. Century will send an electronic notification through the central reporting facility to the United States Secret Service and the Federal Bureau of Investigation (the "investigating agency"). This notification will include a description of the CPNI that was disclosed, how the breach was discovered, an analysis of the sensitivity of the breached CPNI, and any corrective measures taken to prevent recurrence of such breach. This will be done through the FCC's link to the reporting facility at <http://www.fcc.gov/eb/cpni>.

**B. Customer Notification.** After Century has completed the process of notifying the investigating agency as described above, it shall notify its customers of a breach of those customers' CPNI. Written notification will be sent via certified mail to each affected customer's address of record. Notwithstanding any state law to the contrary, Century shall not notify customers or disclose the breach to the public until 7 full business days have passed after notification to the investigating agency except as in the following two parts of this section.

1. If Century believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than otherwise allowed under the above paragraph of this section, in order to avoid immediate and irreparable harm, it shall so indicate in its notification to the investigating agency, and may proceed to immediately notify its

affected customers only after consultation with the investigating agency. Century shall *cooperate with the investigating agency's request to minimize any adverse effects of such customer notification.*

2. If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, the investigating agency may direct Century not to disclose or notify for an initial period of up to 30 days. That period may be extended by the agency as reasonably necessary in the judgment of the investigating agency. If such a direction is given, the investigating agency shall notify Century when it appears the public disclosure or notice to affected customers will no longer impede or compromise a criminal investigation or national security. The investigating agency shall provide in writing its initial direction to Century, any subsequent extension, and any notification that notice will no longer impede or compromise a criminal investigation or national security and such writing shall be contemporaneously logged on the same FCC's link to the reporting facility that contains records of notifications filed by carriers.

**C. Recordkeeping.** Century will maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the investigating agency, and all notifications made to customers. This record must include, if available:

1. Dates of discovery and notification.
2. A detailed description of the CPNI that was the subject of the breach.
3. The circumstances of the breach.

Century will retain the record for a minimum of 2 years.

**D. Definitions.** As used in this section, a "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.

## **IX. Safeguards by Company**

### **Customer Records**

When a marketing campaign requires customer approval, Century customer service records will clearly establish the status of the customer CPNI approval. Record of this approval or disapproval will be kept for a minimum of 3 years. The customers' approval or disapproval will remain in effect until revoked by the customer.

All personnel of Century will be trained annually or upon commencement of employment regarding CPNI policies. These policies include when the employee is authorized to use and when the employee is NOT authorized to use CPNI. Any infractions of Century's CPNI policies will be reported to the General Manager and a record will be made of the infraction(s) and disciplinary steps will be taken.

An infraction of this CPNI policy will result in disciplinary action as stated in the Century Employee Handbook Item III. Employee Rules, Section 1. List of Specific Infractions, 3. *Disregard for Customer Relations.*

## **X. Interface with CALEA Compliance**

In order to comply with certain Communications Assistance for Law Enforcement Agencies (CALEA) rules, Century has engaged the services of a trusted third party provider. This third party provider is involved in the event of a request for certain types of surveillance activities by Law Enforcement Agencies (LEAs).

Century has added the following addendum to its third party provider CALEA contract:

Whereas Century is required by law and its Century policies to protect the privacy and security of the information regarding its customers,

To the extent that [Name of Third Party Provider], in rendering services for Century receives customer proprietary network information, as that term is defined under 47 U.S.C. § 222 and interpreted by the FCC ("CPNI"), [Name of Third Party Provider] shall maintain the confidentiality of such CPNI according to the terms of the statute and rules of the FCC consistent with any obligations imposed on the use of that CPNI by Century. [Name of Third Party Provider] shall promptly delete from its records any CPNI that is received by [Name of Third Party Provider] which is not delivered to an LEA pursuant to a lawfully authorized intercept request.

## **XI. Interface with Contractors**

Century has occasion to utilize contractors for specific projects needed for the conduct of its business. Century requires all its contractors to include the following language in all agreements with Century:

Whereas Century is required by law and its Century policies to protect the privacy and security of the information regarding its customers,

To the extent that [Name of Contractor], in rendering services for Century receives customer proprietary network information, as that term is defined under 47 U.S.C. § 222 and interpreted by the FCC ("CPNI"), [Name of Contractor] shall maintain the confidentiality of such CPNI according to the terms of the statute and rules of the FCC consistent with any obligations imposed on the use of that CPNI by Century. [Name of Contractor] shall promptly delete from its records any CPNI that is received by [Name of Contractor] in its engagement with Century.

## **XII. Training of Employees**

Century provides annual training to existing employees, and training to all new employees, on the proper use and disclosure of CPNI. Records of the training material and documentation of attendance are kept on file. Individual employee training records are maintained for 7 years after the end of the individual's employment with the company.

Included as a part of the employee training is the need to communicate to Century employees that the customer always retains the right to restrict Century or affiliate use of CPNI data. This restriction applies to the authorized use and sharing of CPNI without customer approval as stated in Section "Customer Approval Not Necessary" of this policies and procedures manual. The customer decision regarding Century use of CPNI will not affect Century's provision of any current customer services.

## **XIII. Annual Review by Company Management**

Century treats customer privacy as a serious issue. Century is proud of its long history of reliable, trustworthy service and is vigilant in the steps that will be taken to ensure customer privacy. Accordingly, Century policy requires this CPNI Policy Manual to be reviewed on an annual basis. This review is conducted at [a time set by the General Manager] each calendar year.

The General Manager's annual review will include, but may not be limited to: a review with GVNW Consulting, Inc. and a review with the Board of Directors.

#### **XIV. Signature Page**

This manual was reviewed by \_\_\_\_\_ on \_\_\_\_\_.  
(Name of Employee) (date)

I have read and understand the CPNI compliance policy of Century Enterprises.

\_\_\_\_\_  
(Signature of Employee)

(This signature page is to be detached from this manual and kept on file by the General Manager for a period of not less than 7 years after the end of the individual's employment with the company.)



285 Mid Century Lane • PO Box 380 • Fairview, IL 61432  
1-888-231-4588 • www.midcentury.com

CPNI Version 1.0ACPS Dec-2007

**Customer Proprietary Network Information (CPNI)  
Statement of CPNI Compliance  
Annual 47 C.F.R. § 64.2009(e) CPNI Certification  
EB Docket 06-36**

**Annual Certification Processes Summary**

**Certification Year** 2007

Reference CEI CPNI Policies and Procedures Manual Section VII. Annual Certification

**The Statements below describe the procedures and actions taken to ensure that Century Enterprises, Inc. is in compliance with the FCC's CPNI Rules**

<b>A. Employee CPNI Training</b>	Century Enterprises, Inc. (CEI) is Mid Century Telephone Cooperative, Inc.' (MCTC) subsidiary long distance company; as such, CEI has no employees. CEI long distance CPNI related training was conducted 12/20/07, 12/21/07, and 12/24/07 in conjunction with Mid Century Telephone all employee CPNI training.
<b>B. Disciplinary – Improper Disclosure of CPNI</b>	Century Enterprises, Inc. is Mid Century Telephone Cooperative, Inc.' subsidiary long distance company; as such, CEI has no employees. As stated and practiced in accordance with MCTC's Employee Handbook Section III. Employee Rules, #3. Disregard For Customer Relations – "...a breach of the confidentiality of a customer account will not be condoned and will result in immediate discipline." Infractions of MCTC's CPNI policies will be reported to the General Manager and a record will be made of the infraction(s) and disciplinary steps will be taken and documented. There were no CPNI employee infractions for 2007.
<b>*C. Process for Opt-in and Opt-out</b>	CEI markets to its customers using the Opt-out approach, when applicable. CEI does not participate in 3 <sup>rd</sup> party marketing and therefore Opt-in has not been utilized. As required by CPNI rules, an Opt-out letter and Opt-out form were mailed to each current customer as a separate mail piece for the 2 year Opt-out requirement. The Opt-out letter and Opt-out form were mailed via regular U.S. mail on 12/26/07. CEI will also mail these Opt-out written notification documents to customers when it runs

	<p>certain sales or marketing campaigns. The written notification allows an opportunity for the customer to Opt-out. If we do not hear from the customer within 30 days, after the mail date of notification, CEI will assume that the customer approves our use of his/her CPNI for the purposes of providing the customer with information about other communications-related services. There were no applicable sales or marketing campaigns for 2007.</p> <p>Occasionally, a CEI representative may ask the customer for oral consent to use the customer's CPNI for the purposes of providing the customer with an offer for products or services not related to the telephone services to which the customer subscribes. If customer oral consent is granted, we may use the customer's CPNI for the duration of such telephone call in order to offer additional services.</p> <p>Explicit comments will be noted to customer accounts when Opt-out letter and Opt-out form is mailed, when an Opt-out election form is received from a customer, or when using oral consent.</p>
<b>D. Actions taken against data brokers (Pretexters)</b>	No known Pretexter violations (breaches) occurred to necessitate any such actions for the year 2007
<b>E. Pretexters process(es) – attempt to access CPNI</b>	No known access to CPNI by Pretexters (breaches) was reported for the year 2007.
<b>F. Customer Complaints – Unauthorized release of CPNI</b>	No customer complaints were received as a result of unauthorized release of CPNI for 2007.
<b>G. Process to ensure Opt-out elections are recorded &amp; followed</b>	<p>Customers may call our business office, or our 24/7 voicemail CPNI line, come in to one of our business office locations, e-mail us, utilize the Opt-out form that is mailed to the customer, or access the form on our website in order to deny or approve our use of the customer's CPNI to offer products or services not related to the telephone services to which the customer currently subscribes. Service order and Customer Service Representative procedures and processing are in place in MCTC's billing system to record Opt-out elections and are strictly practiced on a daily basis. Follow-up verification of Opt-out restrict or un-restrict may be viewed by authorized personnel within a customer's account in the billing system. Billing system reporting capabilities ensure extraction of customer's Opt-out elections as necessary. Record of approval or disapproval is retained for a minimum of 3 years.</p>
<b>H. Other CPNI Compliance measures</b>	Access to customer CPNI is limited to authorized personnel and restriction pass codes are used to facilitate safeguard assurance. Safeguards for release of call detail

information, including, but not limited to, the establishment of password protection and a secret question and answer have been implemented. The customer password is not derived from readily available biographical or account information. Notification of customer account changes is strictly practiced on a daily basis. Interface with contractors and any third party provider has CPNI resolution. Mid Century is a "small entity" by definition of the FCC and as such has been granted a six month extension for the authentication requirements as applicable to online account access. Therefore, June 8, 2008 will be the effective date as it relates to online access. Mid Century's CPNI enhancements to its billing software and online access include safeguard provisioning for its affiliate companies.

**\*Mid Century Telephone will honor any customer CPNI elections it receives by recording the restriction or non-restriction to the company and to its affiliate companies, Century Enterprises, Inc. and Cen-Satt, Inc., customer account record.**

Form 499 Filer ID: 808474

Date Filed: February 22, 2008

Signed: 

Russell D. Schrodt  
Executive Vice President/General Manager



**ATC COMMUNICATIONS**

225 West North Street • P.O. Box 98 • Albion, Idaho 83311  
Telephone: (208) 673-5335 • Fax: (208) 673-6200 e-mail: atc@albiontel.com

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**DOCKET FILE COPY ORIGINAL** FCC Mail Room

February 21, 2008

**VIA UPS**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Albion Telephone Company Inc.  
CPNI Certification – EB Docket No. 06-36

Dear Ms. Dortch,

ATC Long Distance, Inc. respectfully submits its CPNI Certification for the calendar year 2007.

If there are any questions regarding this submission, please contact me at (208) 672-5335.

Regards,

Robert Kraut  
Controller

Enclosure

c: FCC, Enforcement Bureau, Telecommunications Consumers Division, 445 12<sup>th</sup> Street, (2 copies via UPS), Best Copy and Printing, Inc. (1 copy via facsimile 202/488-5563)

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